

EXHIBIT B

1 Q. And how long have you been registered to vote
2 for?

3 A. Since I turned 18.

4 Q. And have you been registered as a Democrat that
5 entire time?

6 A. Yes.

7 Q. And the address -- your current residence, is
8 that the same address that you're registered to vote
9 under?

10 A. Yes.

11 Q. And is that the same address that you were
12 registered to vote under at the time of the November
13 2020 Presidential election?

14 A. Yes.

15 Q. By the way, how long have you lived at your
16 residence for?

17 A. About six and a half years.

18 Q. And prior to that, were you also in East
19 Cleveland or did you live somewhere else?

20 A. I lived in Walden Massachusetts.

21 Q. Did you vote in the 2020 Presidential election?

22 A. Yes.

23 Q. Did you vote by mail or in person?

24 A. I voted in person.

25 Q. And where did you do that specifically?

1 A. At the election office.

2 Q. Have you ever voted by mail before?

3 A. Yes.

4 Q. When was that?

5 A. The prior election.

6 Q. Is there any particular reason that you decided
7 to vote in person in the 2020 Presidential election?

8 A. I don't remember. Oh, yes, because the issues
9 around mail delivery.

10 Q. Can you be more specific. What issues in
11 particular are you referring to?

12 A. I believe there were issues about mailboxes
13 being removed and mailing equipment being taken out of
14 post offices and so it didn't -- it just was -- it made
15 me feel uncertain and I wanted to be sure my vote was
16 counted.

17 Q. And when you say "uncertain", what exactly were
18 you uncertain about?

19 A. I was uncertain that my ballot would arrive in
20 time.

21 Q. And is it fair to say that's because there were
22 issues with the U.S. Postal Service at the time?

23 A. Exactly.

24 Q. Aside from those issues, were there any other
25 concerns that you had about mail in voting at the time?

1 MR. GOLD: Objection.

2 A. It is my contention that within this call,
3 using these statements in my city is designed to
4 frighten Black people because these are the people who
5 are the majority of the people in my zip code are Black.

6 Q. Do you know what other cities this call was
7 sent to?

8 A. I do not know.

9 Q. So is it fair to say you don't know whether
10 this call was also sent to predominantly White cities?

11 A. That is true, I don't know.

12 Q. Have you spoken to anyone in the Black
13 community who received this call?

14 MR. GOLD: Objection.

15 A. No.

16 Q. So you don't know how the Black community
17 perceives this call, correct?

18 MR. GOLD: Objection.

19 A. Because I've grown up in America and have had
20 Black friends my entire life, I know how Black people
21 feel about these kinds of efforts to make them fearful.

22 Q. Have you spoken to any of those friends about
23 this call?

24 A. No.

25 Q. So again, is it fair to say you do not know how

1 the Black community perceives this call?

2 MR. GOLD: Objection.

3 A. In a word, no. But this is not really a
4 question that one can answer with a yes, no answer.

5 Q. Well, your opinion is based on your assumption
6 about how the Black community would feel about this
7 call; is that not correct?

8 A. My opinion is based on conversations I've had
9 with Black friends about other things, nothing to do
10 with this call and from reading that I've done my entire
11 life about tactics used against Black people.

12 Q. So your opinion on how the Black community
13 would perceive this call is based on an assumption,
14 correct?

15 MR. GOLD: Objection.

16 A. I'm -- I really am -- an assumption means that
17 there's been no education or learning or experience
18 behind something and one just makes -- has a belief
19 system based on no evidence. One -- an intelligent
20 person can look at something like the text of this call,
21 can also know -- I personally know how this call
22 impacted and affected me emotionally and to know that
23 this would not play well amongst other people,
24 particularly Black people.

25 Q. And you don't believe that your opinion on how

1 this would affect the Black community is based on your
2 own racial biases?

3 MR. GOLD: Objection. Argumentative.

4 A. If you're using bias in a negative sense, then
5 I don't agree. If you're saying -- one can be bias for
6 something or against something, okay. If you're trying
7 to make me say that I am personally racist, then, I -- I
8 really object to that.

9 Q. I'm certainly not suggesting that. I'm asking
10 whether this -- your opinion is based on your own
11 stereotypes about the Black community?

12 MR. GOLD: Objection. Argumentative.

13 A. I believe I just answered that. It sounds like
14 you're trying to make me say that I am racist. And I am
15 trying to say that there is so much documented evidence
16 of how Black people have been treated in this country
17 for hundreds of years. This is based on information --
18 my feelings about this are based on information.

19 Q. Okay. You mentioned -- you testified before
20 that this call was very distressing to you and had an
21 emotional impact. What in particular was distressing
22 about this call to you?

23 A. I believe I covered that. I will tell you
24 again that my --

25 Q. I'm sorry, I cut you off, I'm sorry.

1 possibly relate to me. And then the next part also was
2 -- just seemed ridiculous.

3 Q. Is it your testimony that you were frightened
4 even though you knew these statements to be false?

5 MR. GOLD: Objection.

6 A. It's my testimony that the first part of it was
7 designed to get one's adrenaline going to specifically
8 be frightening to say that the police could find you
9 because so many people in this country are afraid of the
10 police, White or Black. There's -- it's just a gut
11 feeling. But very quickly after that, as I said, when
12 we went from there to the debt collection, I very
13 quickly realized that this was not meant for me
14 personally.

15 Q. You testified earlier that you're now hesitant
16 to pick up the phone as a result of this call; is that
17 correct?

18 A. Yes.

19 Q. Do you receive the majority of your calls to
20 your landline or to your cell phone?

21 A. My landline.

22 Q. And which phone are you now hesitant to pick up
23 as a result?

24 A. My landline.

25 Q. Have you sought any type of mental health or

1 psychological treatment as a result of any feelings you
2 have about this call?

3 A. No.

4 Q. Is there a particular reason you haven't sought
5 any counseling?

6 A. It's not necessary. This is not a -- this was
7 not a personal attack. This was random. I don't feel
8 that my life has been destroyed in any way by this call,
9 so there's no reason for me to seek counseling on this.
10 In our lives we have so many intrusive things that
11 happen, that this is another one of the small things
12 that happen.

13 Q. Another one of the many intrusive things that
14 happen in our lives, correct?

15 MR. GOLD: Objection.

16 A. In general, yes. Nobody's life is made of
17 cotton candy and whipped cream.

18 Q. Mine certainly isn't either. Prior to
19 receiving this call, did you have any plans to vote by
20 mail?

21 A. Yes, I always had plans to vote by mail.

22 Q. Did this call impact your decision on whether
23 or not to vote by mail?

24 A. No.

25 Q. And your decision was impacted on the things

1 Q. And I know you testified in quite some detail
2 about it, but I just want to be clear, at the time you
3 received the robo call, were you personally intimidated
4 by it?

5 MR. GOLD: Objection.

6 A. I was frightened for a moment until I realized
7 that this was not -- that I was not the target.

8 Q. Is it fair to say that you were able to see
9 through the alleged intimidation of the robo call?

10 A. Yes, I was able to see through it, which is why
11 I was so angry that this was happening.

12 Q. At the time you received the robo call, did you
13 believe that members of the Black community would not be
14 able to see through this alleged intimidation?

15 MR. GOLD: Objection.

16 A. That never occurred to me.

17 Q. Did you feel threatened by the robo call?

18 A. I think I've already testified to the answer
19 being yes, the first part with the police departments
20 will track down old warrants, I do not have any warrants
21 old or new. But when one is saying that -- when one
22 picks up the phone -- when I picked up the phone, I did
23 not expect to get this kind of a call. There's no
24 introduction in terms of preparing -- there's know way
25 to be prepared to receive a phone call like this.